November, 2011

OSHA Announces Changes to Fall Protection Requirements for Residential Construction

Dear Valued 3M Customer,

The United States Department of Labor’s Occupational Safety and Health Administration (OSHA) recently rescinded the interim enforcement policy on fall protection for specified residential construction activities. Under the new policy, employers engaged in residential construction must comply with 29 CFR 1926.501(b)(13). Enforcement of this new residential roofing directive began September 15, 2011.

“Under 29 CFR 1926.501(b)(13), workers engaged in residential construction six (6) feet or more above lower levels must be protected by conventional fall protection (i.e., guardrail systems, safety net systems, or personal fall arrest systems) or alternative fall protection measures allowed under 1926.501(b) for particular types of work. A personal fall arrest system may consist of a full body harness, a deceleration device, a lanyard, and an anchor point. (See the definition of “personal fall arrest system” in 29 CFR 1926.500). If an employer can demonstrate that fall protection required under 1926.501(b)(13) is infeasible or presents a greater hazard it must implement a written, site-specific fall protection plan meeting the requirements of 29 CFR 1926.502(k). The fall protection plan must specify alternative measures that will be used to eliminate or reduce the possibility of employee falls.”*

For purposes of determining the applicability of section 1926.501(b)(13), the term “residential construction” is interpreted as covering construction work that satisfies the following two elements:

1. The end-use of the structure being built must be as a home, i.e., a dwelling; and
2. The structure being built must be constructed using traditional wood frame construction materials and methods.

For more information regarding changes to fall protection requirements in the residential construction industry, please visit www.osha.gov/doc/residential_fall_protection.html

To help aid compliance in the industry and promote safe working practices, 3M offers a personal fall arrest kit which may be appropriate for residential roofing applications – 3M™ Fall Protection Roofing Kit 20058.

For more information regarding product offerings for worker safety at height, please contact your local 3M representative, visit www.3M.com/FallProtection or contact your 3M Customer Service Representative at 1-800-328-1667.

Best Regards,

John Kehoe
Sales Operations Manager
3M Occupational Health and Environmental Safety